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MAY 7 10 30 AM '98

MARK HERRON  
Also Admitted in Georgia

May 5, 1998

Joel J. Roessner, Esquire  
Office of General Counsel  
Federal Elections Commission  
999 E Street, N.W.  
Washington, DC 20463

Re: MURs 4544 and 4407  
Subpoena Issued to Florida Democratic Party

Dear Mr. Roessner:

The purpose of this correspondence is to forward to you the responses of the Florida Democratic Party (FDP) to the Subpoena to Produce Documents and Order to Submit Written Answers issued by the Federal Elections Commission (FEC).

Please find enclosed the following:

1. Notice of FDP Serving Answers to Interrogatories.
2. FDP's Answers to Interrogatories.
3. FDP's Response to Request to Produce Documents.

By separate Federal Express package, the documents listed in the Response noted above, are being forwarded to you.

I trust that this information is responsive to the FEC's subpoena. If you have any additional questions or concerns, please let me know.

Sincerely,

  
Mark Herron

MH/bjd  
Enclosure

cc: Scott Falmlen, Executive Director, FDP  
MHPA 010-12

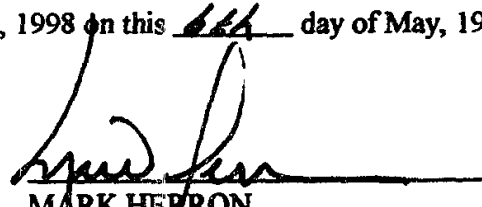
BEFORE THE FEDERAL ELECTIONS COMMISSION

MURs 4407 AND 4544

**NOTICE OF FLORIDA DEMOCRATIC PARTY  
SERVING ANSWERS TO INTERROGATORIES**

To: Joel J. Roessner, Esquire  
Office of General Counsel  
Federal Elections Commission  
999 E Street, N.W.  
Washington, DC 20463

You are notified that the undersigned has served answers to the interrogatories propounded  
by the Federal Elections Commission on March 31, 1998 on this 6th day of May, 1998.

  
MARK HERRON  
Mark Herron, P.A.  
216 South Monroe Street, Suite 200-A  
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(850) 567-4878  
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FL BAR NO. 199737

Attorney for the Florida Democratic Party

**BEFORE THE FEDERAL ELECTIONS COMMISSION**

**MURs 4407 and 4544**

**FLORIDA DEMOCRATIC PARTY'S ANSWERS**  
**TO INTERROGATORIES**

The Florida Democratic Party (FDP) serves the following Answers to the Interrogatories issued by the Federal Elections Commission on March 31, 1998.

**INTERROGATORY NO. 1:** Identify each and every person who has knowledge or information regarding the planning, organization, development and/or creation of television, radio or print advertisements produced by SKO and paid for in whole or in part by the DNC.

**RESPONSE:** I am not aware of who may or may not have knowledge or information regarding planning, organization, development and/or creation of television, radio or print advertisements produced by SKO and paid for in whole or in part by the DNC.

**INTERROGATORY NO. 2:** Identify each and every person who has knowledge or information regarding the planning, organization, development and/or creation of television, radio or print advertisements produced by SKO and paid for in whole or in part by the Florida Democratic Party or any other State Democratic Party.

**RESPONSE:** Don Fowler, former National Chair, Democratic National Committee.  
Chris Dodd, former General Chair, Democratic National Committee.  
Maureen Garde, Democratic National Committee.  
Joe Sandler, Democratic National Committee.  
Brad Marshall, Democratic National Committee.  
Minyon Moore, formerly with the Democratic National Committee.  
Jill Alper, Democratic National Committee.  
Debbie Wilhite, formerly with the Democratic National Committee.  
B.J. Thornberry, formerly with the Democratic National Committee.  
James Brady, Democratic National Committee/Assoc. of State Democratic Chairs.  
Terrie Brady, Chair, Florida Democratic Party  
Scott Falmlen, Executive Director, Florida Democratic Party  
Sylvia Holt, Formerly with the Florida Democratic Party.

**INTERROGATORY NO. 3:** Identify each and every person who has knowledge or information regarding the planning, organization development and/or creation of television, radio or print advertisements produced by November 5 and paid for in whole or in part by the DNC.

**RESPONSE:** I am not aware of who may or may not have knowledge or information regarding planning, organization, development and/or creation of television, radio or print advertisements produced by SKO and paid for in whole or in part by the DNC.

**INTERROGATORY NO. 4:** Identify each and every person who had knowledge or information regarding the planning, organization, development and/or creation of television, radio or print advertisements produced by November 5 and paid for in whole or in part by the Florida Democratic Party or any other State Democratic Party.

**RESPONSE:** Don Fowler, former National Chair, Democratic National Committee.  
Chris Dodd, former General Chair, Democratic National Committee.  
Maureen Garde, Democratic National Committee.  
Joe Sandler, Democratic National Committee.  
Brad Marshall, Democratic National Committee.  
Minyon Moore, formerly with the Democratic National Committee.  
Jill Alper, Democratic National Committee.  
Debbie Wilhite, formerly with the Democratic National Committee.  
B.J. Thornberry, formerly with the Democratic National Committee.  
James Brady, Democratic National Committee/Assoc. of State Democratic Chairs.  
Terrie Brady, Chair, Florida Democratic Party  
Scott Falmlen, Executive Director, Florida Democratic Party  
Synovia Holt, Formerly with the Florida Democratic Party.

**INTERROGATORIES NO. 5:** State the time and date of each meeting and telephone conversation during which there was any discussion of any kind concerning the planning, organization, development and/or creation of television, radio or print advertisements. Such discussion includes but is not limited to discussion of advertisements produced in whole or in part by SKO, advertisements produced in whole or in part by November 5, advertisements paid for in whole or in part by the DNC, advertisements paid for in whole or in part by the Florida Democratic Party or any other State Democratic Party, and advertisements paid for in whole or in part by Clinton/Gore. "Meeting" means any discussion among two or more persons, including discussions that were incidental to another meeting topic, telephone conversations, and discussion by any other electronic medium. For each meeting:

- a. Identify the location of the meeting, and for telephone or other electronic discussions, the location of each participant.
- b. Identify each and every person who attended, heard or participated in any meeting. For each identified person, indicated which meeting that person attended, heard or participated in, and the date that each meeting occurred.
- c. Describe the substance, decisions, discussion and details of each and every meeting.
- d. Identify who produced the specific advertisements discussed in the meeting, including SKO, November 5, or some other entity or person.
- e. Identify each person or entity that paid in whole or in part for any advertisements that were discussed, including but not limited to the DNC, the Florida State Democratic Party, other State Democratic Committees and Clinton/Gore, and the amount paid by each person or entity.

**RESPONSE:** I am not aware of any face to face meetings concerning the planning, organization, development and/or creation of television, radio or print advertisements involving SKO, November

5, Clinton/Gore and/or the DNC. I am aware of telephone conversations between myself and representatives of the DNC concerning such advertising. However, I am unable to state the time and date of these telephone conversations. In almost every instance, the telephone conversations I had were with Maureen Garde. These telephone conversations dealt with television ad scripts , advertising buys, and financial arrangements for ad purchases. The Florida Democratic Party paid for all such advertising with funds legally contributed to it.



**INTERROGATORIES NO. 6:** Identify each and every person from whom SKO purchased time to air television or radio advertisements. For each identifies person, indicate what advertisements aired, the television or radio station on which the advertisements aired, the date the advertisements aired, how may times the advertisements aired, the price of airing the advertisements, and who paid for the airing of the advertisements.

**RESPONSE:** I am not aware of the specific stations on which advertising time was purchased, the dates and times on which the advertising ran, the number of advertisements aired or the price. In every instance, the media firm contracted with the station.

**INTERROGATORY NO. 7:** Identify each and every person from whom November 5 purchased time to air television or radio advertisements. For each identified person, indicated what advertisements aired, the television or radio station on which the advertisements aired, the date the advertisements aired, how many times the advertisements aired, the price of airing the advertisements, and who paid for the airing of the advertisements.

**RESPONSE:** I am not aware of the specific stations on which advertising time was purchased, the dates and times on which the advertising ran, the number of advertisements aired or the price. In every instance, the media firm contracted with the station.

**INTERROGATORY NO. 8:** Identify each and every newspaper, magazine or other publication where SKO purchased space to publish advertisements. For each identified publication, indicate what advertisements were published, the date the advertisements were published, the price of publishing the advertisements, and who paid for the publication of the advertisements.

**RESPONSE:** I am not aware of any print advertising placed by SKO on behalf of the Florida Democratic Party.

**INTERROGATORY NO. 9:** Identify each and every newspaper, magazine or other publication where November 5 purchased space to publish advertisements. For each identified publication, indicate what advertisements were published, the date the advertisements were published, the price of publishing the advertisements, and who paid for the publication of the advertisements.

**RESPONSE:** I am not aware of any print advertising placed by November 5 on behalf of the Florida Democratic Party.

**INTERROGATORY NO. 10:** Describe any information, instructions or advice provided to the Florida Democratic Party by the DNC, Clinton/Gore, SKO or November 5, or any of their officials or agents concerning any media advertisements including television, radio, or print advertisements.

**RESPONSE:** Beginning in the Fall, 1995 and continuing through the Fall, 1996, the Democratic National Committee would recommend to the Florida Democratic Party that it purchase television advertising advocating national issues in selected media markets. In most instances, the DNC would send a script and a tape of the proposed advertisement. If the Party agreed with the recommendations, the DNC would assist the Party in raising funds enough to make the purchase.

VERIFICATION

STATE OF FLORIDA §

COUNTY OF LEON §

BEFORE ME, the undersigned authority, on this day personally appeared \_\_\_\_\_  
SCOTT FALMEL who, after having been duly sworn, stated that the above and  
foregoing answers to interrogatories are true and correct.

SWORN TO AND SUBSCRIBED before me by the said \_\_\_\_\_ on  
this 5<sup>th</sup> day of MAY, 1998 to certify which, witness my hand and seal of office.

Lavone Baucham  
NOTARY PUBLIC FOR THE  
STATE OF FLORIDA

LAVONE BAUCHAM  
Notary Public, State of Florida  
My Commission Expires June 26, 2000  
Commission #CC 567737

**BEFORE THE FEDERAL ELECTIONS COMMISSION**

**MURs 4407 and 4544**

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**FLORIDA DEMOCRATIC PARTY'S RESPONSE**  
**TO REQUEST TO PRODUCE DOCUMENTS**

The Florida Democratic Party (FDP) responds as follows to the Document Request of the Federal Elections Commission issued March 31, 1998:

1. Correspondence concerning 1995-1996 media buys paid for in whole or part by the Democratic National Committee (DNC).
  - a. Correspondence dated June 14, 1996 from DNC re: "Defend." (013730)
  - b. Correspondence dated June 11, 1996 from DNC re: "Dreams." (013731)
  - c. "Dreams" script (013732)
  - d. Newsarticle - Orlando Sentinel (June 12, 1996). (013733)
  - e. "Photo" script (013734)
  - f. Correspondence dated May 21, 1996 from DNC re: "same." (013735)
  - g. "Same" script. (013736)
  - h. Blank page (013737)
  - i. Correspondence dated May 31, 1996 from DNC re: "Side." (013738)
  - j. Correspondence dated April 19, 1996 from DNC re: "Photo" (013739)
  - k. Correspondence dated April 12, 1996 from DNC re: "Supports." (013140)
  - l. "Supports" script. (013741)
  - m. Memo from Maureen Garde with attachments. (013742-013746)
  - n. Correspondence dated March 13 1996 from DNC re: "Welfare" and

**"Victims" with attached scripts (013747-013749)**

- o. "Table" script. (013750)**
  - p. Correspondence dated May 3, 1996 from DNC re: "Finish" with attached script. (013751-013752)**
  - q. Correspondence dated April 26, 1996 from DNC re: "Background" with attached script. (013753-013754)**
  - r. Memo from Maureen Garde with attachments. (013755-013756)**
  - s. Correspondence dated March 29, 1996 re: "No" with attached scripts. (013757-013767)**
  - t. Memo from Maureen Garde with attachments. (013768-013733)**
  - u. "Defend" script with backup information. (013774-013778)**
  - v. Correspondence dated June 26, 1996 re: "Values.2." with scripts. (013779-013781)**
- 2. 1995 Contributions to FDP from DNC. (004646-004780)**
  - 3. 1996 Contributions to FDP from DNC. (000008-000413)**
  - 4. 1995 Payments to FDP/DNC Vendors from FDP. (004788-004890)**
  - 5. 1996 Payments to FDP/DNC Vendors from FDP. (000427-000660)**
  - 6. 1995 Federal and State Campaign Finance Reports. (005978-007145)**
  - 7. 1996 Federal and State Campaign Finance Reports (003013-004628).**
  - 8. 1995 FDP Long-Distance Telephone Logs. (004935-005977)**
  - 9. 1996 FDP Long-Distance Telephone Logs. (000883-003012)**



**Figure 1** *Mean (SD) serum concentrations of total cholesterol, HDL cholesterol, and triglycerides in the 2 groups.*

FL BAR NO. 199737

**Attorney for the Florida Democratic Party**